

UNITED STATES DISTRICT COURT
EASTER DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

JACQUELINE VERSER,

Plaintiff,

v.

Case No. 20-cv-649

CARING WITH HONOR, LLC,

Defendant.

STIPULATION

Plaintiff, Jacqueline Verser, by her attorneys, Walcheske & Luzi, LLC, and Defendant, Caring With Honor, LLC, by its attorneys, Reinhart Boerner Van Deuren s.c. (collectively, the "Parties"), pursuant to Civil L. R. 26(e)(1), hereby stipulate and state as follows:

1. The Parties possess information that they believe in good faith contains trade secrets or nonpublic confidential technical, commercial, financial, personal, or business information, which requires limiting access to the information consistent with the provisions of the Protective Order;

2. Entry of the Protective Order will facilitate discovery in this litigation, particularly the exchange of documents, things, information, testimony, and other evidence that the Parties consider proprietary, confidential, private, and/or sensitive information;

3. The exchange of sensitive information between or among the Parties and/or third parties other than pursuant to the Protective Order may cause unnecessary damage and injury to the Parties or to others;

4. The Proposed Protective Order conforms to the model in the Appendix to the Local Rules for the U.S. District Court for the Eastern District of Wisconsin; and

5. The Parties stipulate and agree to abide by the terms of the Protective Order once it is filed with the Court.

Dated this 28th day of August, 2020.

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